

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

IN RE: FLEMUEL BROWN, III	Case No. 23-11171-djb Chapter 13
FLEMUEL BROWN, III, Movant	
vs.	
Firsttrust Bank, Respondent	

**RESPONSE TO MOTION TO RECONSIDER ORDER GRANTING RELIEF  
FROM STAY**

Firsttrust Bank, (herein, “Respondent”) by and through undersigned counsel, hereby responds to the Motion to Reconsider Order Granting Relief from Stay [Doc. 68] filed on August 29, 2025 and in support thereof, shows unto the Court as follows:

**Jurisdiction**

1-3. Admitted.

**Background**

4. Admitted.

5. Admitted.

6. Admitted.

7. Admitted.

8. Denied. By way of further answer, Debtor is post-petition due for August 1, 2025 – present which totals \$2,569.00. In addition to the \$2,569.00 the debtor also owes \$550.00 to

Respondent for attorney fees incurred regarding this Motion. The Total Amount needed to cure is \$3,119.00. Attached hereto and marked as Exhibit A is a copy of the current payment history.

**Argument**

9. Admitted.

10. Denied. By way of further answer, it is denied that the account is current. Since the Respondent has already rolled arrears into the plan with regard to the original Motion for Relief the Respondent will not agree to stipulate to cure any of the current arrears. Either the debtor cures the full arrears or the Court should deny the Motion in its entirety.

11. Denied.

**WHEREFORE**, Respondent respectfully requests that this Honorable Court deny the Motion to Reconsider Order Granting Relief from Stay and for any other relief the Court deems just and proper.

This the 12th day of September, 2025

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

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**L.B.F. 9014-4**

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vs.	
FLEMUEL BROWN, III , Debtor	

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on September 16, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Response to Debtor's Motion to Reconsider Order Granting Relief

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: September 16, 2025

/s/Andrew Spivack  
Andrew Spivack, PA Bar No. 84439  
Mario Hanyon, PA Bar No. 203993  
Ryan Srnik, PA Bar No. 334854  
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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

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